

# EXHIBIT D

**From:** Gannon, Kevin  
**Sent:** Wednesday, February 17, 2021 3:15 PM  
**To:** Matthias Kamber; kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com  
**Cc:** Singular; Vella, Matthew D.; Hayes, Paul  
**Subject:** RE: Singular v. Google - Notice of Deposition of David Patterson  
**Attachments:** 2020-10-02 (-12551) Singular's First Rule 30(b)(6) Notice to Google.pdf

Matthias,

While we are waiting for dates in February for the deposition of David Patterson, please identify and provide dates for a deposition for a Google witness pursuant to 30(b)(6) to testify with respect to topics 5, 62-65, 70-73 and 91-93 from the attached Rule 30(b)(6) notice that was originally served on October 2, 2020.

Thanks,  
Kevin

Kevin Gannon



Prince Lobel Tye LLP  
One International Place, Suite 3700  
Boston, Massachusetts 02110

617 456 8061 Direct  
[kgannon@princelobel.com](mailto:kgannon@princelobel.com)

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**From:** Gannon, Kevin  
**Sent:** Friday, February 12, 2021 3:58 PM  
**To:** Matthias Kamber <mkamber@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; nhueston@kblfirm.com; kvpsingular@keker.com  
**Cc:** Singular <Singular@princelobel.com>; Hayes, Paul <phayes@princelobel.com>; Vella, Matthew D. <mvella@princelobel.com>  
**Subject:** RE: Singular v. Google - Notice of Deposition of David Patterson

Matthias,

Please provide alternative dates in February for this deposition. We will make arrangements to take it by remote means.

Thanks,  
Kevin

Kevin Gannon



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One International Place, Suite 3700  
Boston, Massachusetts 02110

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**From:** Matthias Kamber [<mailto:mkamber@keker.com>]

**Sent:** Thursday, February 11, 2021 3:35 PM

**To:** Gannon, Kevin <[kgannon@princelobel.com](mailto:kgannon@princelobel.com)>; [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); [abhansali@kblfirm.com](mailto:abhansali@kblfirm.com); [mkwun@kblfirm.com](mailto:mkwun@kblfirm.com); [nhueston@kblfirm.com](mailto:nhueston@kblfirm.com); [kvpsingular@keker.com](mailto:kvpsingular@keker.com)

**Cc:** Singular <[Singular@princelobel.com](mailto:Singular@princelobel.com)>; Hayes, Paul <[phayes@princelobel.com](mailto:phayes@princelobel.com)>; Vella, Matthew D. <[mvella@princelobel.com](mailto:mvella@princelobel.com)>

**Subject:** RE: Singular v. Google - Notice of Deposition of David Patterson

Kevin,

We will be providing objections either today and tomorrow and are still waiting to hear back regarding potential availability. Accordingly, the deposition will not proceed on the 17<sup>th</sup> as noticed.

Best,

Matthias

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**From:** Gannon, Kevin <[kgannon@princelobel.com](mailto:kgannon@princelobel.com)>

**Sent:** Thursday, February 11, 2021 12:13 PM

**To:** [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); [abhansali@kblfirm.com](mailto:abhansali@kblfirm.com); [mkwun@kblfirm.com](mailto:mkwun@kblfirm.com); [nhueston@kblfirm.com](mailto:nhueston@kblfirm.com); [kvpsingular@keker.com](mailto:kvpsingular@keker.com); Matthias Kamber <[MKamber@keker.com](mailto:MKamber@keker.com)>

**Cc:** [singular@princelobel.com](mailto:singular@princelobel.com); [phayes@princelobel.com](mailto:phayes@princelobel.com); [mvella@princelobel.com](mailto:mvella@princelobel.com)

**Subject:** RE: Singular v. Google - Notice of Deposition of David Patterson

[EXTERNAL]

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Counsel,

Please confirm that the deposition of David Patterson will take place on the date noticed so that we can make the arrangements.

Thanks,

Kevin

Kevin Gannon

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One International Place, Suite 3700  
Boston, Massachusetts 02110

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**From:** Gannon, Kevin

**Sent:** Thursday, February 4, 2021 6:55 PM

**To:** 'wgs-singularv.google@wolfgreenfield.com' <[wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com)>; 'abhansali@kblfirm.com' <[abhansali@kblfirm.com](mailto:abhansali@kblfirm.com)>; 'mkwun@kblfirm.com' <[mkwun@kblfirm.com](mailto:mkwun@kblfirm.com)>; 'nhueston@kblfirm.com' <[nhueston@kblfirm.com](mailto:nhueston@kblfirm.com)>; 'kvpsingular@keker.com' <[kvpsingular@keker.com](mailto:kvpsingular@keker.com)>; Matthias Kamber <[mkamber@keker.com](mailto:mkamber@keker.com)>

**Cc:** Singular <[Singular@princelobel.com](mailto:Singular@princelobel.com)>; Hayes, Paul <[phayes@princelobel.com](mailto:phayes@princelobel.com)>; Vella, Matthew D. <[mvella@princelobel.com](mailto:mvella@princelobel.com)>

**Subject:** RE: Singular v. Google - Notice of Deposition of David Patterson

Counsel,

Please see attached.

Thanks,  
Kevin

**Kevin Gannon**

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